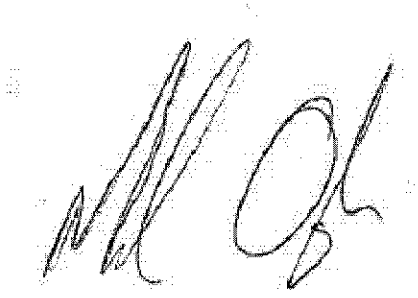
DECLARATION OF R. MICHAEL OGLE II

I, R. Michael Ogle II, hereby declare as follows:

1. I am a zoo herpetologist that has worked in this field for approximately 20 years. Over that time period, I started as a volunteer and slowly rose through the ranks to become curator of herpetology at Knoxville Zoological Gardens. In addition to my responsibilities at the zoo that covers animal welfare, exhibit design, and budget planning, I work with the Association of Zoo's and Aquarium (AZA) in several different additional positions. I currently serve as the AZA Chelonian Taxon Advisory Group Chair, as well as the Species Survival Plan (SSP) coordinator for Bog Turtles (*Glyptemys muhlenbergii*), Radiated Tortoises (*Astrochelys radiata*), Madagascar Flat-tailed Tortoises (*Pyxis planicauda*), and Madagascar Spider Tortoises (*Pyxis arachnoides*). Because of my strong interest in turtles and tortoises I also serve on the U.S. Wildlife Trafficking Alliance Zoo and Aquarium Working Group.
2. As a zoo herpetologist with a strong interest in turtles and tortoises, I have visited many areas in the United States, as well as the country of Madagascar to achieve a better understanding of the natural history of many chelonian species as well as to help protect them for the black market trade. In 2008, I was an invited guest and speaker at the International Union for the Conservation of Nature (IUCN) red list meeting for the turtles and tortoises of Madagascar in Antananarivo, Madagascar.
3. For the last few years as Chelonian TAG chair, I have been contacted by United States Fish and Wildlife Service on multiple occasions to help place confiscated turtles, primarily native species. Unfortunately, the frequency at which these calls happen are occurring at an ever increasing rate. The majority of turtles that are confiscated have had their final destination listed as China or Hong Kong. What was initially labeled as the Asian Turtle Crisis began in the late 1990's when a developing middle and upper class in China started consuming native turtles for medicinal, food, and pet purposes. This has led to the local extirpation of countless chelonian species, and eventually spilled over into neighboring countries from China. As the turtles become rarer, the demand and monetary value only increased leading to more poaching efforts throughout Asia. As those other Asian countries become depleted over the next 10-15 years, collection efforts moved overseas to include turtles found in the United States. Thousands of turtles have been removed from the United States to Asia, primarily China over the last decade before state and federal agencies were able to diminish the legal collecting seasons in many states. While this has saved countless turtles, poachers are continuing to remove turtles and cause local populations to completely disappear. The most commonly collected species are Box Turtles (*Terrapene* sp.), Spotted Turtles (*Clemmys guttata*), North American Wood Turtles (*Glyptemys muhlenbergii*), and Map Turtles (*Graptemys* sp.). These species are primarily collected for the pet trade due to their unique and colorful shell patterns.
4. After reviewing the documents provided for this case, and the frequency and number of turtles collected, I strongly feel that the defendant was trafficking in wild collected turtles to satisfy the black market trade in these species in Hong Kong. All of the species mentioned are CITES protected turtles, and in one instance is a threatened species as listed on the USFWS Endangered Species Act, Yellow-blotched Map Turtles (*Graptemys flavimaculata*), and are not allowed for export in the manner in with the defendant was transporting these turtles from the United States.

5. I declare under penalty of perjury that the foregoing is true and correct. Executed the 30th of January, 2020, at Knoxville, Tennessee, United States of America



R. Michael Ogle II

Zoo Herpetologist